

EXHIBIT B

From: Rudy Fink <rfink@davisfirm.com>
Sent: Wednesday, July 6, 2022 2:52 PM
To: Nokia309
Cc: TQDelta Listserv
Subject: TQ Delta v. Nokia - Van Bruyssel Deposition

EXTERNAL SENDER – Proceed with caution

Counsel:

If Nokia will not put Van Bruyssel up for his 30(b)(1) deposition, we will need to go to the Court. His personal knowledge is relevant, including his personal experience with the standards, standards organizations, and the accused products. TQ Delta was not able to depose him on his personal knowledge due to the extensive 30(b) topics he was named on after we noticed his 30(b)(1) deposition.

On our meet and confer today, Nokia took the position that it would not produce Van Bruyssel for his 30(b)(1) deposition.

Unless Nokia disagrees, we need to confirm Nokia's position that it will not allow Mr. Van Bruyssel to be deposed on a lead and local meet and confer. Please let us know your availability to confer today. TQD is generally available. If Nokia is not available today, please let us know your availability on Thursday. It does not sound like the call would be long (perhaps just 5 minutes or so).

Regards,

Rudy Fink
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